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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	<u>SUPERSEDING</u>
)	<u>INDICTMENT</u>
Plaintiff,)	
)	JUDGE JOHN R. ADAMS
v.)	
)	CASE NO. 1:16CR265
ERICK JAMAL HENDRICKS,)	
)	Title 18, United States Code,
Defendant.)	Section 2339B(a)(1)

I. GENERAL ALLEGATIONS

The Grand Jury charges:

At all times relevant to this Superseding Indictment, except where otherwise noted:

1. ERICK JAMAL HENDRICKS was a citizen of the United States.
2. A.A., a co-conspirator not charged herein, was located within the Northern District of Ohio.
3. An undercover law enforcement employee (hereinafter, the "UCE") was located within the Northern District of Ohio.
4. The Islamic State of Iraq and the Levant (hereinafter, "ISIL") was a designated Foreign Terrorist Organization under Section 219 of the Immigration and Nationality Act and a Specially Designated Global Terrorist Entity under section 1(b) of Executive Order 13224.

II. STATUTORY ALLEGATIONS

COUNT 1

(Conspiracy to Provide Material Support and Resources to a Foreign Terrorist Organization)

The Grand Jury further charges:

5. The allegations of paragraphs 1 through 4 of this Superseding Indictment are re-alleged and incorporated as if fully rewritten herein.

6. From on or about December 1, 2014, through on or about May 31, 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant ERICK JAMAL HENDRICKS, a citizen of the United States, and others known and unknown to the Grand Jury, knowingly did combine, conspire, confederate, and agree to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel, and services, to a foreign terrorist organization, namely the Islamic State of Iraq and the Levant (hereinafter, "ISIL"), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIL was a designated foreign terrorist organization and that ISIL engages in and has engaged in terrorist activity and terrorism.

OBJECT OF THE CONSPIRACY

7. The objects of the conspiracy were to: (1) recruit individuals in the United States to form a cell of ISIL supporters; (2) train individuals recruited for the cell of ISIL supporters to commit acts of violence in the United States on behalf of ISIL; and (3) commit acts of violence in the United States on behalf of ISIL.

MANNER AND MEANS OF THE CONSPIRACY

8. To attain the objects of the conspiracy, Defendant and his co-conspirators took the following steps and employed the following manner and means as part of the conspiracy:

a. Defendant used social media applications to communicate with individuals known and unknown to the Grand Jury, including A.A., who appeared to support ISIL.

b. Defendant vetted individuals he communicated with to determine if they were suitable for joining a cell of ISIL supporters.

c. Defendant vetted individuals he communicated with to determine if they were working on behalf of law enforcement.

d. Defendant directed individuals he had previously vetted, to vet other potential recruits through communications on social media applications.

e. Defendant provided advice to individuals he recruited for his cell about methods of avoiding detection by law enforcement, including methods to safely communicate using social media applications and to conduct counter-surveillance of law enforcement.

f. Defendant attempted to conceal his communications with potential recruits from possible law enforcement surveillance.

g. Defendant directed individuals such as A.A., and others known and unknown, to connect Defendant to other like-minded individuals for recruitment by Defendant.

h. Defendant distributed documents to recruits that provided advice on how to avoid law enforcement detection.

i. Defendant provided suggestions to recruits about materials they should read, including lectures by Anwar Al-Awlaki and materials that contained bomb-making instructions and information on law enforcement surveillance methods.

j. Defendant attempted to purchase land to be used for training in military tactics for members of the cell he was recruiting.

k. Defendant met in person with potential recruits to discuss the creation of a cell to conduct attacks in the United States on behalf of ISIL.

l. Defendant claimed that he obtained guidance from “senior brothers” in ISIL.

m. Defendant suggested that UCE travel to Garland, Texas, to a contest for drawing the Prophet Mohammad.

n. Defendant asked UCE about security measures at the contest for drawing the Prophet Mohammad in Garland, Texas.

o. Defendant caused a document to be posted online that claimed “Islamic State in America” committed the attack at the Garland, Texas contest for drawing the Prophet Mohammad and warned of future attacks.

All in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 2

(Attempting to Provide Material Support and Resources to a Foreign Terrorist Organization)

The Grand Jury further charges:

9. The allegations of paragraphs 1 through 4 of this Superseding Indictment are re-alleged and incorporated as if fully rewritten herein.

10. From on or about December 1, 2014, through on or about May 31, 2015, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant ERICK JAMAL HENDRICKS, a citizen of the United States, did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b),

including personnel, specifically himself, A.A., UCE, and others, and services, to a foreign terrorist organization, namely the Islamic State of Iraq and the Levant (“ISIL”), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIL was a designated foreign terrorist organization and that ISIL engages in and has engaged in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Section 2339B(a)(1).

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts pursuant to the E-Government Act of 2002.